

## **EXHIBIT B**

1 IN THE UNITED STATES DISTRICT COURT  
2 FOR THE DISTRICT OF ARIZONA  
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IN RE: BARD IVC FILTERS PRODUCTS )  
5 LIABILITY LITIGATION, ) MD No.:  
\_\_\_\_\_) MD-15-02641-PHX-DGC

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DO NOT DISCLOSE - SUBJECT TO FURTHER  
CONFIDENTIALITY REVIEW

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DEPOSITION OF ROBERT MICHAEL CARR, JR.

16

Phoenix, Arizona

17

March 18, 2016

9:00 a.m.

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23 REPORTED BY:

24 Robin L. B. Osterode, RPR, CSR

25 AZ Certified Reporter No. 50695

1 I'm just looking for the flow of command.

2 A. So it starts at the project team level,  
3 which is at the division.

4 Q. Okay.

5 A. So there's a team of individuals of  
6 multiple disciplines who develop products, filters in  
7 this case.

8 Q. Okay.

9 A. So it's their responsibility first; that  
10 person has a supervisor; that person has a  
11 supervisor. There's a vice president of quality at  
12 the division level.

13 Q. Okay.

14 A. And they report to a person at Bard  
15 corporate, I call it.

16 Q. Okay. And so, in a sense, is the  
17 person at Bard corporate the last pass before -- or  
18 looking over this assurance that something's  
19 been met, you know, the testing standards or  
20 regulations, at the division level?

21 A. No, it's the responsibility of the  
22 division.

23 Q. Okay. I guess I'm confused as to what the  
24 person at C. R. Bard or what you call Bard corporate  
25 does for the division in that regard, in quality.

1           A.       They don't do much at the day-to-day level.

2       They ultimately oversee the divisions of Bard.

3           Q.       Okay.

4           A.       The day-to-day operations of a division are  
5       at the division level.

6           Q.       Okay. Right. So I'm just trying to -- can  
7       you give me an example of something that someone at

8       C. R. Bard would do for, you know, BPV?

9           A.       So they would set corporate quality  
10       standards or guidances that the divisions would need  
11       to follow at a global level; the divisions then have  
12       a set of standard operating procedures, they're  
13       called, that meet those corporate guidances.

14          Q.       I got it. And is there any investigation  
15       into whether they're actually following the corporate  
16       standards set forth by C. R. Bard?

17          A.       Yes, we have internal audits often.

18          Q.       Okay. And before, I guess we keep going  
19       through the other departments, I'd like to just get a  
20       good understanding of the divisions themselves. Are  
21       these separate entities, or are these subsidiaries of  
22       C. R. Bard, or are they, like, departments, like we  
23       described before?

24          A.       So they're -- they're structured as  
25       divisions. So there are four, today, four divisions

1 of Bard, Bard Peripheral Vascular, Davol, Bard Access  
2 Systems, and Bard Medical Systems. And so those  
3 divisions, we call them, operate very distinct from  
4 each other as -- as if they were their own entities,  
5 for the most part.

6 All four of those businesses have a  
7 reporting structure to the overall corporate  
8 structure.

9 Q. Okay. I think I understand. So they're,  
10 in a sense, their own business that reports back up  
11 to Bard corporate or C. R. Bard?

12 A. Ultimately.

13 Q. Okay. Okay. And we'll get back to that.  
14 So what is, I think regulatory, I think is what you  
15 mentioned before, what does regulatory at C. R. Bard  
16 do?

17 A. So they interact with the different  
18 regulatory organizations around the globe, and, you  
19 know, so we can -- different countries have different  
20 requirements for submissions to get your products on  
21 the market, and we have global regulatory filings.  
22 Each country, different regions are different. So  
23 they file and deal with the regulatory organizations.

24 Q. Okay. So for -- if it's -- let's talk  
25 about the U.S., if these divisions are sort of

1 handle their own and report up?

2 A. Correct. It all rolls up.

3 Q. Legal, is that pretty straightforward as  
4 well?

5 A. It is.

6 Q. Now, I did have a look at that, it -- I  
7 guess -- are they -- is the legal department a  
8 department that just ensures that all the products  
9 are, I guess, not breaking law or meeting the  
10 regulatory standards?

11 A. No, I would consider them a full  
12 functioning legal department, so be it financial  
13 regulation, be it we have a general counsel. All  
14 matters of legal breadth.

15 Q. And they don't, the divisions -- I guess  
16 what I'm getting at is the divisions themselves don't  
17 have their own legal department?

18 A. We have an IP attorney, intellectual  
19 property, attorney at the division level.

20 Q. Okay. But for the most part, C. R. Bard  
21 handles all of the legal work for all the divisions  
22 and subsidiaries; is that correct?

23 A. I know for BPV, I believe it's true for  
24 all.

25 Q. What about science and technology, what do